



Eric Gonzalez  
District Attorney

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KINGS COUNTY  
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[INSERT NAME]  
Assistant District Attorney

[INSERT DATE]

[INSERT D/C INFO]

Re: [INSERT CASE NAME]  
Kings County Dkt./Ind. No. [#####]

In connection with the above-named case, the People voluntarily provide the following information regarding:

**MOS NAME:** MICHAEL GAYNOR

**MOS TAX:** [REDACTED]

in satisfaction (to the extent applicable) of their constitutional, statutory, and ethical obligations. Further, the People reserve the right to move in limine to preclude reference to this information, or otherwise to object to its use and/or introduction into evidence.

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**Disclosure # 1:**

THE NYPD SUBSTANTIATED THE FOLLOWING ALLEGATION(S), DATED 02/09/2004, AGAINST MOS GAYNOR:

1. DEPARTMENT RULES VIOLATION – OTHER (TOOK SUMMONS FROM TRAFFIC ENFORCEMENT AGENT)

**Disclosure # 2:**

THE PEOPLE ARE AWARE OF THE FOLLOWING FEDERAL CIVIL RIGHTS ACTION(S) AND/OR STATE TORT CIVIL LAWSUIT(S) IN WHICH THE INDICATED OFFICER HAS BEEN NAMED AS AN INDIVIDUAL DEFENDANT. NOTE, THE DISPOSITION INFORMATION MAY NOT BE CURRENT:

PLAINTIFF	DOCKET	COURT	FILED	DISPOSED	DISPOSITION
Donald Debrosse	13-CV-3822	E.D.N.Y.	7-9-13	8-2-17	Judgment in favor of the defendants on motion for Summary Judgment
Hendy Dabel	04-CV-9899	S.D.N.Y.	12-16-04	7-29-05	Settlement without admission of fault or liability

IN ADDITION, OUR OFFICE IS AWARE OF THE FOLLOWING CIVIL ACTION(S):

1. JACQUELINE MOSELEY V. CITY OF NEW YORK, ET AL, 11CV5603, FILED IN THE EASTERN DISTRICT OF NEW YORK.

**BASED UPON CCRB DOCUMENTS UP TO DATE THROUGH OCTOBER 13, 2020, THE PEOPLE ARE UNAWARE OF ANY PENDING AND OR SUBSTANTIATED CCRB ALLEGATIONS AGAINST THIS OFFICER.**

Eric Gonzalez  
District Attorney  
Kings County